

No.	Area	Concept	Already being done?	Policy Change?	State Regulation Change?	State Statute Change?	Federal Statute or Regulation Change?
1	Fees	All permit categories should pay fully for the cost of the state to issue and administer permits. Permit costs need to be self-sustaining for the program costs for that permit type.	No	Yes	Yes	Yes	No
2	Fees	No fee increase; maybe a readjustment within the fee structure.	There has been no fee increase since 2000.	No	Yes	Yes	No
3	Fees	Facilities have to pay for multiple permits with multiple fees (local land disturbance + department permit). Remove administrative and financial burden of multiple permits and fees.	No	Yes	Yes	Yes	No
4	Fees	Allow the department to recover the costs for the review of permits.	No	Yes	Yes	Yes	No
5	Fees	Funds should be allocated for a particular purpose related to the source of funds as opposed to putting in one pot and divided within the program.	Some funds are allocated for a particular purpose; additional changes would depend on the source of the funds.	Yes	Yes	Yes	Yes
6	Fees	Willing to pay more fees if there is more compliance assistance.	Some compliance assistance is being done; the department is developing a more comprehensive compliance assistance strategy.	No	Yes	Yes	No
7	Fees	Certain events that affect the public should be paid out of general revenue (i.e., emergency response).	Yes		Yes	Yes	No
8	Fees	SRF Administration fee disproportionately funds the water pollution program; SRF fees should cover just the expenses of the SRF program; SRF Admin fee should be reduced back to 0.5%.	The SRF Admin fee is currently 1%.	Yes	No	No	No
9	Fees	Charge extra for expedited permits.	No	Yes	Yes	Yes	No
10	Fees	Fees need to at least cover the amounts of the ‘borrowed’ sources of funds.	No	No	Yes	Yes	No

No.	Area	Concept	Already being done?	Policy Change?	State Regulation Change?	State Statute Change?	Federal Statute or Regulation Change?
11	Fees	How would we pay for antidegradation or affordability? Hourly rate? Lump Sum?	No	Yes	Yes	Yes	No
12	Fees	Develop list of ‘new’ things that fees do not cover.					
13	Fees	Return to EPA any program categories that do not want to pay their cost of implementation.			Yes	Yes	Yes
14	Fees	Permit fees should be based on design flow (including municipals).	All site-specific permits, with exception of municipals, are roughly based on design flow, although rules allow the use of adjusted flows.	Yes	Yes	Yes	No
15	Fees	Eliminate practice of charging municipalities based on number of connections; should be based on design or actual flow.	No	Yes	Yes	Yes	No
16	Fees	Any method of collecting cost for service has to allow for adjustment when additional hours are DNR’s responsibility (training, mistakes) and not due to the permittee.	No	Yes	Yes	Yes	No
17	Fees	Reduce the number of billings to lower administrative cost.	No	Yes	Yes	No	No
18	Fees	If charging based on services, must allow waivers in certain circumstances (such as natural disasters).	No	Yes	Yes	Yes	No
19	Fees	Imposing fees on development and job creating activities is counterproductive; program funding should come from all citizens.	No	Yes	Yes	Yes	No
20	Fees	Do not rely on General Revenue.	General Revenue expenditures for Clean Water functions for FY2011 was \$2,579,415.	No	No	No	No

No.	Area	Concept	Already being done?	Policy Change?	State Regulation Change?	State Statute Change?	Federal Statute or Regulation Change?
21	Fees	Keep unit cost per user low on fees; small systems cannot afford upgrades and could revert back to septic or on-site which is not positive toward the environment.	Current fees for small systems (non municipals) are based on design flow.	No	Yes	Yes	No
22	Fees	Before fee increases are proposed, reallocate existing funding from department programs not mandated by state or federal law; cut program costs; and identify other funding sources.		Yes	Possible	No	No
23	General Suggestions	We should maintain a state-integrated water program that continues DNR historic functions and maintains a viable, delegated program.					
24	General Suggestions	Have a program that is in partnership with EPA, not dominated by EPA.					
25	General Suggestions	Support for state costs for greater efficiencies such as electronic permitting, core watershed based permitting, water quality standards, TMDLs.					
26	General Suggestions	Ensure a cost benefit analysis has been performed to determine whether fees and charges will have a negative economic impact on the municipality, industrial, or agricultural area involved.	Partially with affordability for publicly-owned facilities.				
27	Staffing	Create staff retention incentives.	No. The departments do not have the authority to provide incentives to encourage staff retention.	Yes	Yes	Yes	
28	Staffing	Training for new staff should include going out to regulated facilities.	No	No	No	No	No

No.	Area	Concept	Already being done?	Policy Change?	State Regulation Change?	State Statute Change?	Federal Statute or Regulation Change?
29	Staffing	Support ‘right to work’ for state employees – Missouri should not be 50 th in payscale.					
30	General Outreach & Assistance	Education – more collaboration between governments, industry and public; Need to increase education among the general public to increase public support for the department. More informed citizens can be more effective. Public signage on highways and in the watershed can help raise awareness. Inform public how they can do their part to protect water.					
31	General Outreach & Assistance	Department should continue efforts to listen, work with, and respond to stakeholders; and should market these efforts better.					
32	General Outreach & Assistance	Department needs to better market our success.					
33	General Outreach & Assistance	The department does not have a brand recognition, the general public does not understand what we do.					
34	General Outreach & Assistance	Think about the whole program in terms of process flow through the program incorporating modeling, monitoring, TMDLs, permits and appropriateness of WQS; OMW should inlcude this.					

No.	Area	Concept	Already being done?	Policy Change?	State Regulation Change?	State Statute Change?	Federal Statute or Regulation Change?
35	General Outreach & Assistance	Financial Assistance – SRF is weighted to larger, perceptively more financially sound recipients.	The SRF priority system is required by federal law and is implemented through federal and state regulations. It is based on water quality. Population is not a consideration unless two proposed projects have the same priority; population is used as a tie breaker.				
36	Environmental Modeling & Monitoring	Monitoring – do additional monitoring and use volunteers to stretch resources and train more volunteers to be able to collect data.	Yes	No	No	No	No
37	Environmental Modeling & Monitoring	Increase scientific thoroughness and collaboration between government, industry and the public.					
38	Environmental Modeling & Monitoring	Use required DMR in-stream monitoring to guide department resource decisions.	Yes; The Department currently uses required DMR and instream monitoring data to guide department resource decisions. Effluent and instream data are used to determine facility and water quality improvements and guide water quality surveys for assessment and 303(d) list removal purposes.	No	No	No	No
39	Environmental Modeling & Monitoring	Conduct weekly bacteria testing for major lakes during the recreational season, regardless of whether there is a swimming beach or not.	No	Yes	No	No	No
40	Environmental Modeling & Monitoring	DNR should set up WQ studies and provide resources (equipment, laboratory analysis, etc) so local watershed groups can supply trained volunteers to collect the samples.	Yes	No	No	No	No

No.	Area	Concept	Already being done?	Policy Change?	State Regulation Change?	State Statute Change?	Federal Statute or Regulation Change?
41	Environmental Modeling & Monitoring	Increase monitoring for nutrients, eColi in lakes and streams.	Yes	Yes	No	No	No
42	Environmental Modeling & Monitoring	Conduct a study or survey to determine if septic tanks are affecting private drinking water wells (source water protection). Groundwater is a state responsibility (waters of the state).	Yes	No	No	No	No
43	Environmental Modeling & Monitoring	Use local laboratories to handle water quality samples. Turnaround time with some samples (e.g. E-coli) may make this a good idea.	Yes (limited)	Yes	Yes	Yes	No
44	Environmental Modeling & Monitoring	Increase frequency and thoroughness of the geographic extent of monitoring in lakes - it should not be just a cove or branch.	Yes	No	No	No	No
45	Environmental Modeling & Monitoring	Electronic (automate) water monitoring to send sample results directly from sampling device to the department.	Yes	No	No	No	No
46	Environmental Modeling & Monitoring	Continuous monitoring of appropriate parameters with appropriate type of monitoring based on the science.	Yes	No	No	No	No
47	Environmental Modeling & Monitoring	Tie drinking water to wastewater to help get wastewater 'off line' out of septic into sewers.	Yes	No	No	No	No
48	Environmental Modeling & Monitoring	With increased stream mileage for TMDLs, make sure DNR has adequate staff to complete UAA's	Yes	Yes	No	No	No

No.	Area	Concept	Already being done?	Policy Change?	State Regulation Change?	State Statute Change?	Federal Statute or Regulation Change?
49	Environmental Modeling & Monitoring	Return environmental modeling and monitoring back to EPA; the science may be the best part to go back to EPA.		No	No	No	No
50	Environmental Modeling & Monitoring	Do not send environmental monitoring and modeling back to EPA; it is difficult to get EPA to back off their data and permits requires good data.		No	No	No	No
51	Environmental Modeling & Monitoring	Do more outreach on stream teams to sign up more volunteers.	Yes	No	No	No	No
52	Environmental Modeling & Monitoring	DNR should help train groups to run load reduction models.	No	No	No	No	No
53	Environmental Modeling & Monitoring	Need to expand our monitoring program to better define WQS.	Yes	Yes	No	No	No
54	Environmental Modeling & Monitoring	Use knowledge from previous testing to find the cause of pollutants. Stop canvas coverage of everything.	Yes	No	No	No	No
55	Environmental Project Mgmt. and Oversight	TMDLs - we need to focus more on quality of TMDLs rather than quantity; earlier engagement and focus more on water quality that makes sense.	Yes	No	No	No	No
56	Environmental Project Mgmt. and Oversight	More money and management needs to be directed toward nonpoint source issues since it is the 'bigger pollutant'.	Yes	Yes	No	No	No

No.	Area	Concept	Already being done?	Policy Change?	State Regulation Change?	State Statute Change?	Federal Statute or Regulation Change?
57	Permitting & Certification	Increase quality control, consistency, timeliness & affordability analysis in permits; decrease arbitrariness in permits; permit requirements should be based in laws and regulations.	Yes	No	Yes	No	No
58	Permitting & Certification	Create expedited permit options.	No	Yes	Yes	Yes	No
59	Permitting & Certification	Reduce review issuance and review time in permits; renewals and modifications take too long.	No	No	No	No	No
60	Permitting & Certification	Reinstitute LOA for small animal operations at actual cost of issuance.	No	Yes	Yes	Yes	No
61	Permitting & Certification	Permittees do not want to receive a permit after the effective date.	No	Yes	No	No	No
62	Permitting & Certification	All aspects must be considered for affordability - including increased monitoring requirements.	Partially; Additional changes in affordability procedure will result from HB1251.	Yes	Yes	No	Possibly
63	Permitting & Certification	Promote the use of alternative BMPs	Yes. Applicant develops the appropriate BMPs in SWPPPs	No	No	No	No
64	Permitting & Certification	Cover minor domestic waste permits by a general permit; reduce the number of site specific permits issued	No	Yes	Yes	No	No
65	Permitting & Certification	Are there any permits we can do away with?	No	Yes	Yes	Yes	No
66	Permitting & Certification	Perform final inspections on all Construction Permits - not just SRF - to be sure it was built the way it was permitted.	Partially (limited by staff resources).	Yes	No	No	No

No.	Area	Concept	Already being done?	Policy Change?	State Regulation Change?	State Statute Change?	Federal Statute or Regulation Change?
67	Permitting & Certification	Keep the pre-PN notification process.	Yes. Changed to 15 days.	No	possibly	Possibly for technical comments	No
68	Permitting & Certification	Timeliness for construction permits needs to improve.	No	No	No	No	No
69	Permitting & Certification	Increase effort for wastewater operators due to impending retirement of many operators.	No	No	No	No	No
70	Permitting & Certification	Use Integrated Planning approach.	Partially; Integrated Planning approach is being implmented in one instance while the department evaluates applicability in other cirucmstances.	Yes	Possibly	Possibly	Possibly
71	Permitting & Certification	Watershed based permits should help us see efficiencies.	No	No	Yes	No	No
72	Permitting & Certification	The same permit writer who does the CP should do the OP.	Yes. The initial OP will be done by the construction permit engineer. That's the plan for CP centralization.	No	No	No	No
73	Permitting & Certification	Design guide (10CSR 20-8) is outdated and makes it difficult to get approval on new and/or innovative technology.	In planning.	Yes	Yes	No	Yes
74	Permitting & Certification	The department does not need to issue Construction permits, except in the cases where SRF money is used.	No	Yes	Yes	Yes	No
75	Permitting & Certification	Land disturbance permits should cover anything over 0.25 acre (single family home construction).	No	Yes	Yes	No	No

No.	Area	Concept	Already being done?	Policy Change?	State Regulation Change?	State Statute Change?	Federal Statute or Regulation Change?
76	Compliance Assistance	Do more Compliance Assistance; do it before there are issues; and keep it seaprate from inspections.	The department is developing a compliance assitance strategy.	Yes	No	No	No
77	Compliance Assistance	Focus on outreach to smaller dischargers, rather than enfocement	The department is developing a compliance assitance strategy.	Yes	No	No	No
78	Compliance Assistance	Combine temporary erosion control with stormwater control as land is being disturbed for sewer installation/land disturbance activities. Consider compost filters as a future approach for BMPs.					
79	Compliance Assistance	Beef up compliance assistance - expanded, more aggressive, proactive CA can prevent a lot of time spent later on inspection and enforcement.	The department is developing a compliance assitance strategy.	Yes	No	No	No
80	Compliance Assistance	Compliance assistance has a different feel than inspectors for permittees - clearly delineate inspection from compliance assistance.	The department is developing a compliance assitance strategy.	Yes	No	No	No
81	Compliance Assistance	Move resources from General Assistance to Compliance Assistance					
82	Compliance Assistance	Help smaller systems meet their limits.	The department is developing a compliance assitance strategy.	Yes	No	No	No
83	Compliance Assistance	Develop CA to help HOAs understand their requirements once developers leave; many don't understand the requirements and what is needed to operate and manage.	The department is developing a compliance assitance strategy.	Yes	No	No	No
84	Inspections	Continue inspections because they and enforcement are critical to maintaining compliance.	Yes	No	No	No	No

No.	Area	Concept	Already being done?	Policy Change?	State Regulation Change?	State Statute Change?	Federal Statute or Regulation Change?
85	Inspections	Review Discharge Monitoring Reports more closely for non-compliance.	Yes	No	No	No	No
86	Inspections	Continue inspections of smaller facilities since they have more problems with compliance than larger facilities.	Yes	No	No	No	No
87	Enforcement	Businesses, corporations and ag businesses that are careless only get a slap on the wrist when they pollute waters of the state; DNR should charge a large fee for damage to waters of the state.	Yes	No	No	No	No
88	Enforcement	Settlements should be used to fund SEPs rather than civil penalties.	Partially (when appropriate).	No	No	No	No